

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

14-cr-176 (JGK)

- against -

DEVYANI KHOBRAGADE,

ORDER

Defendant.

JOHN G. KOELTL, District Judge:

The Court has received the attached motion. The movant is not a party to this case and has no right to file a motion in this case. Therefore, the motion is **stricken**.

The Clerk of Court is respectfully directed to strike the motion from the docket.

SO ORDERED.

Dated: New York, New York
May 16, 2025

/s/ John G. Koeltl

John G. Koeltl
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Write the full name of each plaintiff or petitioner.

Case No. 1:14- CR-00176-WHP

-against-

Devyani Khobragade

NOTICE OF MOTION

Write the full name of each defendant or respondent.

9-11.233 - Presentation of Exculpatory Evidence

PLEASE TAKE NOTICE that

neither

plaintiff or defendant

Srikanth Sreedhar

name of party who is making the motion

requests that the Court:

took cognizance of the documents that I filed in CIVIL CASE #: 1:24-cv-07440-LTS to invoke "9-11.233 - Presentation of Exculpatory Evidence" & direct the Office of Professional Responsibility to review as they fail to inform the Court that the US Attorney admitted in his book that strip / cavity search is a Fourth Amendment violation due to no probable cause. US Govt didn't honor my contract on issue of Visa for US Citizenship.

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- a memorandum of law
- my own declaration, affirmation, or affidavit
- the following additional documents: US Attorney's statement on Dec 18 2013.

5/15/25

Dated



Signature

Srikanth Sreedhar

Name

1-15-49/355

Prison Identification # (if incarcerated)

Dr A S Rao Nagar TS, INDIA 500062

Address

City

State

Zip Code

Telephone Number (if available)

Srikanth.Officially@gmail.com

E-mail Address (if available)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America

Fill in above the full name of each plaintiff or petitioner.

Case No. 1:14- CR -00176-WHP

-against-

Devyani Khobragade

Fill in above the full name of each defendant or respondent.

DECLARATION

Direction from the Court to the Office of Professional Responsibility

under "9-11.233 - Presentation of Exculpatory Evidence" to Grand Jury

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Srikanth Sreedhar, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

The Citi Bank Credit Card statements for Card No. 4128003333467846 between May 2008-Dec 2008 will prove that I am a NEW YORK CITIZEN who travelled without a visa from Canada to New York with coworkers Steve Nicaise and Kim Gannon. After I got the visa in the last week of Aug 2008, I landed in D.C. from Canada. I left Boston for Canada in May 2008. Thus, clearly, I had no visa when I visited Lake Placid, New York with coworkers. So, as a New York Citizen, I have the right to approach SDNY. As the US Govt initiated CRIMINAL ACTION 1:14-cr-00176-WHP against Devyani Khobragade and this action is still PENDING in SDNY, and as the facts of my case could potentially exculpate Khobragade besides establishing that I'm a NEW YORK CITIZEN and US CITIZEN, it means that if the court lets me file in the CRIMINAL CASE, then the TRUTH will come out.

So I request the Court to let me file in the CRIMINAL CASE against Khobragade by directing the Clerk of the SDNY to give me the CORRECT CRIMINAL CASE NUMBER (1:14-cr-00176-WHP) because in CASE #: 1:24-cv-07440-LTS, I did not know the CORRECT CRIMINAL CASE NUMBER and the Pro Se Intake Unit accidentally created CIVIL CASE #: 1:24-cv-07440-LTS. It is important that I am allowed to directly file in the CRIMINAL CASE for the following REASONS:

1) Facts of my case are exactly like in the maid's case as my employer and the US Govt didn't honor the contract on issue of visa. Bringing this fact to the notice of the Grand Jury will expose the US Govt for its DUPLICITY because when the US Govt itself is not ready to honor the contract on issue of visa, what RIGHT does the US Govt have to seek JAIL TERM for Khobragade for allegedly signing a second contract with the maid on issue of visa to nullify the first contract? How is it that ONLY Khobragade faces Jail term and not the maid when both of them are signatories to the second contract?

2) (A) The fact In the matter of murder of my friend at the University of Florida that the cops refused to gather DNA Samples from the lower part of the body will cause the Grand Jury make the US Marshals accountable for totally unjustified strip / cavity search of Khobragade given that the US Attorney has himself stated that strip / cavity search could have and SHOULD HAVE BEEN AVOIDED. This could potentially lead to a proper probe by FBI into my friend's murder. (B) As the US Attorney has stated in the Khobragade case in justification of his actions as follows: One wonders whether any government would not take action regarding false documents being submitted to it in order to bring immigrants into the country. It means that the US Govt should justify issuing student visa to NITK / Mangalore University students when there is proof that these 'academic institutions' create fake documents. This is important because NITK has caused the death of a student. If the US Govt is sincere, then why have they not acted against NITK / Mangalore University? Isn't it true that the US Consulate in Hyderabad, India knows about this and yet remained silent? (C) Maid was allowed to proceed ANONYMOUSLY in SDNY but my INTERNET RIGHTS under FERPA were not protected given that my marks are showing up on the INTERNET and FERPA protects UNAUTHORIZED disclosure of a student's grades. (D) In the matter of money that Ravi Duvvuri owes me, the US Marshals could be asked to trace him in North Carolina but the US Marshals are not being asked to act though they had a role in needless strip / cavity search of Khobragade when she was under their custody.

Attach additional pages and documents if necessary.

5/15/25

Executed on (date)

Signature



Srikanth Sreedhar

Name

1-15-49/355

Prison Identification # (if incarcerated)

Dr A S Rao Nagar TS, INDIA 500062

Address

City State Zip Code

Srikanth.Officially@gmail.com

Telephone Number (if available)

E-mail Address (if available)



Docket No: 1:14-cr-00176-WHP
Filer's Name: Srikanth Sreedhar
Address: 1-15-49/355, Dr A S Rao Nagar, TS, INDIA. PIN 500062
Mobile: +919493221018

S. Srikanth

PRESS RELEASE

Statement Of Manhattan U.S. Attorney Preet Bharara On U.S. V. Devyani Khobragade

Wednesday, December 18, 2013

For Immediate Release

U.S. Attorney's Office, Southern District
of New York

There has been much misinformation and factual inaccuracy in the reporting on the charges against Devyani Khobragade. It is important to correct these inaccuracies because they are misleading people and creating an inflammatory atmosphere on an unfounded basis. Although I am quite limited in my role as a prosecutor in what I can say, which in many ways constrains my ability here to explain the case to the extent I would like, I can nevertheless make sure the public record is clearer than it has been thus far.

First, Ms. Khobragade was charged based on conduct, as is alleged in the Complaint, that shows she clearly tried to evade U.S. law designed to protect from exploitation the domestic employees of diplomats and consular officers. Not only did she try to evade the law, but as further alleged, she caused the victim and her spouse to attest to false documents and be a part of her scheme to lie to U.S. government officials. So it is alleged not merely that she sought to evade the law, but that she affirmatively created false documents and went ahead with lying to the U.S. government about what she was doing. One wonders whether any government would not take action regarding false documents being submitted to it in order to bring immigrants into the country. One wonders even more pointedly whether any government would not take action regarding that alleged conduct where the purpose of the scheme was to unfairly treat a domestic worker in ways that violate the law. And one

wonders why there is so much outrage about the alleged treatment of the Indian national accused of perpetrating these acts, but precious little outrage about the alleged treatment of the Indian victim and her spouse?

Second, as the alleged conduct of Ms. Khobragade makes clear, there can be no plausible claim that this case was somehow unexpected or an injustice. Indeed, the law is clearly set forth on the State Department website. Further, there have been other public cases in the United States involving other countries, and some involving India, where the mistreatment of domestic workers by diplomats or consular officers was charged criminally, and there have been civil suits as well. In fact, the Indian government itself has been aware of this legal issue, and that its diplomats and consular officers were at risk of violating the law. The question then may be asked: Is it for U.S. prosecutors to look the other way, ignore the law and the civil rights of victims (again, here an Indian national), or is it the responsibility of the diplomats and consular officers and their government to make sure the law is observed?

Third, Ms. Khobragade, the Deputy General Consul for Political, Economic, Commercial and Women's Affairs, is alleged to have treated this victim illegally in numerous ways by paying her far below minimum wage, despite her child care responsibilities and many household duties, such that it was not a legal wage. The victim is also alleged to have worked far more than the 40 hours per week she was contracted to work, and which exceeded the maximum hour limit set forth in the visa application. Ms. Khobragade, as the Complaint charges, created a second contract that was not to be revealed to the U.S. government, that changed the amount to be paid to far below minimum wage, deleted the required language protecting the victim from other forms of exploitation and abuse, and also deleted language that stated that Ms. Khobragade agreed to "abide by all Federal, state, and local laws in the U.S." As the Complaint states, these are only "in part" the facts, and there are other facts regarding the treatment of the victim – that were not consistent with the law or the representations made by Ms. Khobragade -- that caused this Office and the State Department, to take legal action.

Fourth, as to Ms. Khobragade's arrest by State Department agents, this is a prosecutor's office in charge of prosecution, not the arrest or custody, of the defendant, and therefore those questions may be better referred to other agencies. I will address these issues based on the facts as I understand them. Ms. Khobragade was accorded courtesies well beyond what other defendants, most of whom are American citizens, are accorded. She was not, as has been incorrectly reported, arrested in front of her children. The agents arrested her in the most discreet way possible, and unlike most defendants, she was not then handcuffed or restrained. In fact, the arresting officers did not even seize her phone as they normally would have. Instead, they offered her the opportunity to make numerous calls to arrange personal matters and contact whomever she needed, including allowing her to arrange for child care. This lasted approximately two hours. Because it was cold outside, the agents let her make those calls from their car and even brought her coffee and offered to get her food. It is true that she was fully searched by a female Deputy Marshal --in a private setting --when she was brought into the U.S. Marshals' custody, but this is standard practice for every defendant,

rich or poor, American or not, in order to make sure that no prisoner keeps anything on his person that could harm anyone, including himself. This is in the interests of everyone's safety.

Fifth, as has been reported, the victim's family has been brought to the United States. As also has been reported, legal process was started in India against the victim, attempting to silence her, and attempts were made to compel her to return to India. Further, the Victim's family reportedly was confronted in numerous ways regarding this case. Speculation about why the family was brought here has been rampant and incorrect. Some focus should perhaps be put on why it was necessary to evacuate the family and what actions were taken in India vis-à-vis them. This Office and the Justice Department are compelled to make sure that victims, witnesses and their families are safe and secure while cases are pending.

Finally, this Office's sole motivation in this case, as in all cases, is to uphold the rule of law, protect victims, and hold accountable anyone who breaks the law – no matter what their societal status and no matter how powerful, rich or connected they are.

Updated May 13, 2015

Component

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Southern District of New York

26 Federal Plaza, 37th Floor
New York, NY 10278



Main Office & Criminal Division: (212) 637-2200